

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

City of Chicago,

*Plaintiff,*

v.

DoorDash, Inc. and Caviar, LLC,

*Defendants.*

Civil Action No. 1:21-cv-05162

Hon. Jeremy C. Daniel  
Magistrate Judge Jeffrey T. Gilbert

**JOINT STATUS REPORT**

Pursuant to this Court's orders dated December 23, 2022 (ECF No. 90) and December 19, 2022 (ECF No. 87) directing the parties to file a status report seven days after each rolling production deadline to provide information about the last rolling production, what has been produced to date in total, and what remains to be produced, the parties hereby file this Joint Status Report concerning the August 30, 2024 production deadline.

**I. Status of the City's Document Productions**

**A. Documents Produced by the City To Date**

As of August 30, the City has produced 8,693 documents, totaling 62,023 pages, in rolling productions. The City's prior productions are described in more detail in the prior joint status reports (ECF Nos. 96, 101, 105, 109, 115, 151, 164, 174, 194, 200, 202, 216, 230, 234, 242, 246, 249, 250, 282, 294, 304, 308, 309, 320, 322, 336, 343, 346). The City did not make an additional production on August 30, 2024.

**B. Remaining Documents to be Produced**

The City continues to review its overall production for completeness. As discussed with the Court, the City will make a production of documents from its RFP No. 41 search on September 6, 2024, and will make another production of documents from its RFP No. 41, 95, and 96 searches on September 27, 2024. The City is reviewing and will produce additional documents from hard drive files that are responsive to RFP Nos. 107, 109, 114, and 116-120. The City produced an updated privilege log on May 9, 2024. The City will supplement the log by September 27, 2024 to include the documents it has reviewed in accordance with the Court's rulings on July 25, 2024 concerning RFP Nos. 95, 96, and 41.

**II. Status of DoorDash's Document Productions**

**A. Documents Produced by DoorDash to Date**

DoorDash made a production on July 24, 2024, which included three spreadsheets created in response to RFPs 44, 90, and 91. Since August 2022, DoorDash has produced a total of 7,723 documents and 39,340 pages across 28 productions. The documents produced to date include:

- Custodial documents responsive to the City's document requests relating to minimum amount promotional discounts, non-partner restaurants, Dasher pay, consumer fees, and menu pricing;
- Documents identified in known non-custodial locations;
- Documents identified from DoorDash's review of documents produced in related investigations and litigations; and
- Spreadsheets that were created in order to respond to the City's requests for specific data.

Additionally, DoorDash served its privilege log on the City on March 22, 2024.

**B. Remaining Documents to be Produced**

DoorDash is in the process of collecting, reviewing, and producing additional documents responsive to the City's RFPs, Set Five, served on March 15, 2024. DoorDash also continues to collect, review, and prepare for production additional documents responsive to agreements reached stemming from the meet-and-confer letters and meetings that occurred ahead of the Court's motion-to-compel deadline on May 15, 2024. DoorDash is also in the process of revising and augmenting its privilege log.

DATED: September 6, 2024

Respectfully submitted,

**CITY OF CHICAGO DEP'T OF LAW,  
AFFIRMATIVE LITIGATION  
DIVISION**

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